

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

CONNECTU LLC,

Plaintiff,

v.

MARK ZUCKERBERG, EDUARDO SAVERIN,
DUSTIN MOSKOVITZ, ANDREW MCCOLLUM,
CHRISTOPHER HUGHES, and THEFACEBOOK,
INC.,

Defendants.

MARK ZUCKERBERG, and
THEFACEBOOK, INC.,
Counterclaimants,

v.

CONNECTU LLC,

Counterdefendant,

and

CAMERON WINKLEVOSS, TYLER
WINKLEVOSS, and DIVYA NARENDRA,

Additional Counterdefendants.

CIVIL ACTION NO. 1:04-cv-11923
(DPW)

PLAINTIFF AND COUNTERCLAIM DEFENDANTS'
FIRST REQUEST FOR THE PRODUCTION OF DOCUMENTS AND THINGS

Pursuant to Rule 34 of the Federal Rules of Civil Procedure, Plaintiff and Counterclaim Defendants (collectively, "Plaintiff") hereby serve this First Request for the Production of Documents and Things on Defendants and Counterclaim Plaintiffs (collectively, "Defendants"), and request that Defendants respond by producing the requested documents at the offices of Plaintiff's counsel, FINNEGAN, HENDERSON, FARABOW, GARRETT & DUNNER, L.L.P.,

Facemash and Coursematch

Request No. 30

All documents relating in any way to facemash, facemash.com, and/or www.facemash.com, as referred to in paragraph 8 of the counterclaims set forth in Defendants' Answer.

Request No. 31

All email(s) written or sent by Mr. Zuckerberg to any person apologizing for facemash, facemash.com, and/or www.facemash.com, as referred to in the November 4, 2003 article in The Harvard Crimson (attached as Exhibit A hereto).

Request No. 32

All email(s) written or sent by Mr. Zuckerberg to friends to show them facemash, facemash.com, and/or www.facemash.com, as referred to in the November 4, 2003 article in The Harvard Crimson (Exhibit A hereto).

Request No. 33

Mr. Zuckerberg's apology letter relating to facemash, facemash.com, and/or www.facemash.com, as referred to in the November 4, 2003 article in The Harvard Crimson (Exhibit A hereto).

Request No. 34

All documents relating in any way to any disciplinary inquiry or investigation, and/or disciplinary action, taken by Harvard University against Mark Zuckerberg relating to facemash, facemash.com, and/or www.facemash.com.

Request No. 35

Mr. Zuckerberg's on-line journal relating to facemash, facemash.com, and/or www.facemash.com, as referred to in the November 4, 2003 article in The Harvard Crimson (attached Exhibit A hereto).

Request No. 36

All documents relating in any way to coursematch or coursematch.com, as referred to in paragraph 8 of the counterclaims set forth in Defendants' Answer.

Calendars

Request No. 37

Any and all paper or electronic calendars kept by Mark Zuckerberg from October 1, 2003 to the present.

Request No. 38

Any and all paper or electronic calendars kept by Eduardo Saverin from October 1, 2003 to the present.

Request No. 39

Any and all paper or electronic calendars kept by Dustin Moskovitz from October 1, 2003 to the present.

Request No. 40

Any and all paper or electronic calendars kept by Andrew McCollum from October 1, 2003 to the present.

Request No. 65

All documents sufficient to identify all elements of the thefacebook.com website as it existed on January 13, 2004, including but not limited to all portions of the website visible to website users and the underlying computer program code.

Request No. 66

All documents sufficient to identify all elements of the thefacebook.com website as it existed on its February 4, 2004 launch date (see paragraph 19 of Defendants' Answer), including but not limited to all portions of the website visible to website users, the underlying computer program code, and documents sufficient to identify such launch date.

Request No. 67

All documents constituting and/or relating to Mark Zuckerberg's development of computer program coding for the website to be known as thefacebook.com, and/or relating to the development of the website itself, including but not limited to design notes, flow charts, libraries of code, testware, etc.

Request No. 68

All documents sufficient to identify, view, and operate each version of the thefacebook.com website from August 2003 to the date of Defendants' response to this request, and the current, live version of the thefacebook.com website.

Request No. 69

All of the computer program coding and/or other work product written or created by Mr. Zuckerberg, or any other person, for or relating to the website known as thefacebook.com, not requested by any other production request served by Plaintiff.

Hard Drive Images

Request No. 116

An electronic image of the entire computer hard drive(s) or other computer memory devices controlled and used by Mark Zuckerberg for email from October 2003 to the present.

Request No. 117

An electronic image of the entire computer hard drive(s) or other computer memory devices controlled and used by Mark Zuckerberg for working on the computer program coding for the website to be known as Harvard Connection, and/or for working on the website itself.

Request No. 118

An electronic image of the entire computer hard drive(s) or other computer memory devices controlled and used by Mark Zuckerberg from October 2003 to the present.

Request No. 119

An electronic image of the entire computer hard drive(s) or other computer memory devices controlled and used by Eduardo Saverin from October 2003 to the present.

Request No. 120

An electronic image of the entire computer hard drive(s) or other computer memory devices controlled and used by Dustin Moskovitz from October 2003 to the present.

Request No. 121

An electronic image of the entire computer hard drive(s) or other computer memory devices controlled and used by Andrew McCollum from October 2003 to the present.

Request No. 122

An electronic image of the entire computer hard drive(s) or other computer memory devices controlled and used by Christopher Hughes from October 2003 to the present.